

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
vs. § Cause No. 05-CR-1849-JH
§
DANA JARVIS, *et al*, §
§
Defendants. §

JOINDER IN DEFENDANTS' JOINT MOTION
TO DISMISS COUNT III, OR IN THE ALTERNATIVE,
FOR A BILL OF PARTICULARS, Doc. 710

Greg Hill, by his undersigned counsel, hereby joins in the motion filed by the CJA defendants on October 20, 2006, seeking to dismiss the money laundering count, Count III, or in the alternative for a bill of particulars (Doc. 710), and would specifically add to facts and argument presented in that motion the following:

Mr. Hill's business records were seized by the government at the time of his arrest, and have not been produced in discovery. He therefore has no discovery concerning alleged money laundering in which he is alleged to have participated directly. He is not substantively charged with money laundering, but only in the conspiracy count. He does not know if the government's theory is that he aided others in money laundering, or if his alleged participation in the conspiracy was by means of direct acts constituting money laundering. Without additional information concerning in what way he supposedly conspired to launder money, he cannot begin to defend against this Count.

Respectfully submitted,

electronically filed
KARI CONVERSE
2001 Carlisle Blvd. NE #E
Albuquerque, New Mexico 87110
(505) 262-8597
Fax (505) 262-1730

Counsel for Mr. Hill

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joinder in Motion was served on James Braun, Assistant United States Attorney, P.O. Box 607, Albuquerque, New Mexico, 87103, on November 2, 2006.

electronically filed

KARI CONVERSE